

Control Number: 51415



Item Number: 109

Addendum StartPage: 0



APPLICATION OF SOUTHWESTERN § BEFORE THE STATE OFFICE OF SOUTHWESTERN § OF

ELECTRIC POWER COMPANY FOR \$ OF AUTHORITY TO CHANGE RATES \$ ADMINISTRATIVE HEARINGS

SOUTHWESTERN ELECTRIC POWER COMPANY'S STATEMENT UNDER SECTION 4 OF PROTECTIVE ORDER

Certain documents provided in response to the Office of Public Utility Counsel's (OPUC) First Request for Information to Southwestern Electric Power Company (SWEPCO), Question Nos. 1-8, 1-11, and 1-19 are exempt from public disclosure pursuant to Section 552.110 of the Public Information Act¹ and are subject to treatment as Confidential and/or Highly Sensitive materials.

Certain materials provided in response to OPUC's Question No. 1-8 contain information related to non-public commercially sensitive internal analysis regarding plant operation and production under various forecasted conditions and assumptions that if released, would provide an advantage to a competitor or bidder and could cause substantial competitive harm to SWEPCO.

The materials provided in response to OPUC's Question Nos. 1-8, 1-11, and 1-19 contain non-public commercially sensitive plant closure analyses and simulation data including variable costs and production under certain assumptions, as well as company compensation information that if released, would provide an advantage to a competitor or bidder and could cause substantial competitive harm to SWEPCO.

Counsel for SWEPCO has reviewed the documents sufficiently to state in good faith that the documents are exempt from disclosure under the Public Information Act and merit the Confidential and Highly Sensitive designations given to them.

109

¹ Tex Gov Code Ann. § 552.001-.353.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I certify that, unless otherwise ordered by the presiding officer, notice of the filing of this document was provided to all parties of record via electronic mail on December 14, 2020, in accordance with the Second Order Suspending Rules issued in Project No. 50664 and Order No. 1 in this matter.

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